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Honorable Colleen McMahon
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

BY ECF

Re: United States v. James Cahill
20 Cr. 521 (CM)

Dear Judge McMahon:

By this letter, defendant James Cahill ("Cahill") respectfully makes two travel requests. First, on October 20, 2020, the Court granted Cahill's motion to travel to certain stores to shop for his household. In that application, I omitted one store at which Cahill also wishes to shop; the Fresh Grocer in Washington Township, New Jersey. Cahill respectfully requests that travel to this store be permitted. Travel to this store, if permitted, will be subject to the same restrictions, necessity for prior Pretrial Services ("PTS") approval and production of receipts requirement as the set forth in the Court's Prior Order. The government, by Assistant United States Attorney Jason Swergold, and PTS, by United States Pretrial Services Officer Winter Pascual, consent to this application.

Second, on November 7, 2020, two grandchildren of defendant's brother, David Cahill, a surety on his bond, are being baptized. The location of the religious ceremony and the reception are close to Cahill's home in Rockland County and have been provided to the government and ("PTS"). Cahill respectfully requests permission to attend both the ceremony and the reception. As to the religious ceremony, both the government and PTS consent to the application. However, as to attendance at the reception, the government objects and PTS does not consent due to their office's policy not to approve attendance at any "social" event for supervisees on home detention. Cahill has been at liberty on a bond that contains numerous conditions including home detention since October 1, 2020. He has been fully compliant with conditions of his release. At the age of seventy-one, family events are of great importance to Cahill. He has not made any request to attend a social event other than the Christening of his grandchildren. Cahill attended that event and dutifully complied with all restrictions. He certainly wishes to remain at liberty and would not engage in any conduct that would jeopardize his freedom. For these reasons, Cahill respectfully submits that his attendance at the reception will not present any risk to the community.

MEMO ENDORSED

*OK he go
change
the request*

11/4/2020

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Thank you for Your Honor's consideration of these requests.

Very truly yours,

Sanford Talkin

Sanford Talkin

cc: AUSA Jason Swergold (by ECF)
USPTO Winter Pascual (by email)